

JOSEPH ONEBANE (1917-1987)
JOHN G. TORIAN, II (1936-1991)

JAMES E. DIAZ, SR.
TIMOTHY J. MCNAMARA
EDWARD C. ABELL, JR.
LAWRENCE L. LEWIS, III †
ROBERT M. MAHONY
DOUGLAS W. TRUXILLO *
RANDALL C. SONGY
MICHAEL G. DURAND
GREG GUIDRY *
JOSEPH L. LEMOINE, JR. ††
MARK L. RILEY
GRAHAM N. SMITH *
GORDON T. WHITMAN
GARY P. KRAUS
RICHARD J. PETRE, JR.
CHARLES J. BOUDREAUX, JR.
THOMAS G. SMART
ROGER E. ISHEE **
STEVEN C. LANZA
JESSE D. LAMBERT ††*
BRENT G. SONNIER ***
GREG R. MIER ††
FRANK H. SPRUIELL, JR. *
MARIA FABRÉ MANUEL
MICHAEL P. MARAIST
JOAN LABBE BOUDREAUX

ONEBANE LAW FIRM

A Professional Corporation

SUITE 600 VERSAILLES BOULEVARD
102 VERSAILLES BOULEVARD (70501)
POST OFFICE BOX 3507
LAFAYETTE, LOUISIANA 70502-3507

FAX: (337) 266-1232
TDD: (337) 266-1217
TELEPHONE: (337) 237-2660

WWW.ONEBANE.COM

February 7, 2005

OF COUNSEL
WILLIAM E. KELLNER
MARK B. OLIVER
CRAIG A. RYAN
GREGORY K. MOROUX
FREDERICK R. PARKER, JR. ††
MICHAEL D. SKINNER
DANIEL C. PALMINTIER

SHREVEPORT OFFICE

400 TRAVIS STREET, SUITE 1000
SHREVEPORT, LA 71101

TELEPHONE: (318) 674-9770
FAX: (318) 674-9775

‡ LL.M. IN HEALTH LAW
† BOARD CERTIFIED TAX ATTORNEY
LL.M. IN TAXATION
†† REGISTERED PATENT ATTORNEY

* ALSO ADMITTED IN TEXAS
** ALSO ADMITTED IN MISSISSIPPI
*** ALSO ADMITTED IN OKLAHOMA

APPLICATION

10845-64139

Honorable James H. Welsh
Commissioner of Conservation
Louisiana Office of Conservation
P.O. Box 94275
Baton Rouge, Louisiana 70804

RE: Homeseekers Zone, Reservoir A
China Field
Jefferson Davis Parish, Louisiana

Dear Commissioner Welsh:

Application is hereby made on behalf of **VICTOR P. SMITH OIL COMPANY, L.L.C.** for the calling of a public hearing, after thirty (30) days legal notice, to consider evidence relative to the issuance of Orders pertaining to the following matters in the **Homeseekers Zone, Reservoir A**, in the **China Field**, Jefferson Davis Parish, Louisiana, to-wit:

1. To establish rules and regulations and create a single drilling and production unit for the exploration for and production of gas and condensate, such unit to be designated Hmskrs RA SUA;
2. To force pool and integrate all separately owned tracts, mineral leases and other property interests within each of the proposed units, with each tract sharing in unit production on a surface acreage basis of participation;
3. To designate the Smith Production Company – Farrell J. Woods, et ux No. 1 Well as the unit well for the proposed unit;

4. To designate Smith Production Company as the unit operator for the proposed unit;
5. To provide that any future wells drilled to the Homeseekers Zone, Reservoir A, within or outside of the proposed unit, should be located in accordance with the spacing provisions of Statewide Order No. 29-E;
6. To provide that the Commissioner of Conservation should be authorized to reclassify this reservoir, by supplemental order without the necessity of a public hearing, if the producing characteristics of the reservoir change and evidence to justify such reclassification is submitted to and accepted by the Commissioner of Conservation; and
7. To consider such other matters as may be appropriate and justified by the evidence presented at the hearing

The Homeseekers Zone, Reservoir A, in the China Field, Jefferson Davis Parish, Louisiana, is hereby defined as being that gas and condensate bearing zone encountered between the depths of 8,941 feet and 9,598 feet, electrical log measurements, in the Smith Production Company – Farrell J. Woods, et ux No. 1 Well, located in Section 1, Township 8 South, Range 4 West, Jefferson Davis Parish, Louisiana.

A conference to discuss the proposed application and any opposition thereto was held at 10:30 a.m. on February 2, 2005, at the Onebane Law Firm, 102 Versailles Blvd., Suite 600, Lafayette, Louisiana, (337)237-2660. A list of the parties who attended the conference is attached hereto. Randall C. Songy, attorney for the applicant, opened the conference with a brief discussion of the Rules of Procedures. David Comeaux, geological consultant for the applicant, explained the applicant's proposal and the geological, engineering, and other bases therefore, and answered questions. David Sturlese, geological consultant for Farrell Woods, presented a counterplan. The parties discussed the possibilities of resolving their differences, but were not able to do so at the conference. The parties indicated they would continue these discussions after the conference. The conference was then adjourned.

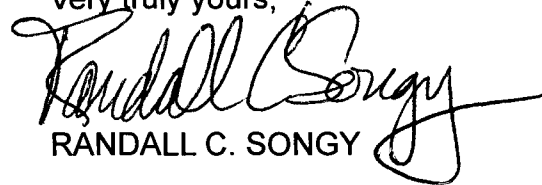
Subsequent to the conference, additional discussions did lead to a resolution of differences, resulting in the unit proposal reflected on the attached plat. This unit proposal will be supported by all parties in attendance at the conference.

Pertinent data relating to the proposed application can be obtained, AT THE COST OF THE REQUESTING PARTY, by contacting **David Comeaux with Leon E. Comeaux & Associates, 305 La Rue France, Lafayette, Louisiana 70508, (337)233-9839.**

There is attached hereto and made a part hereof a plat outlining the proposed unit and a list of the names and addresses of the interested parties to whom this unitization proposal is being sent. Pursuant to the Revised Rules of Procedure, such list of parties is being furnished ONLY to the Commissioner of Conservation and to the District Manager of the Lafayette District of the Office of Conservation. However, the list of parties will be provided to any party requesting a copy of it. A reasonable effort was made to ascertain the names and addresses of all Interested Owners, Represented Parties and Interested Parties.

Finally, enclosed herein is our check in the amount of \$755.00 made payable to the Office of Conservation in payment of the required hearing application fee.

Very truly yours,


RANDALL C. SONGY

RCS/elg/bad

Enclosures

cc: Mr. Richard Hudson, District Manager
Office of Conservation

All Interested Owners, Interested Parties and
Represented Parties

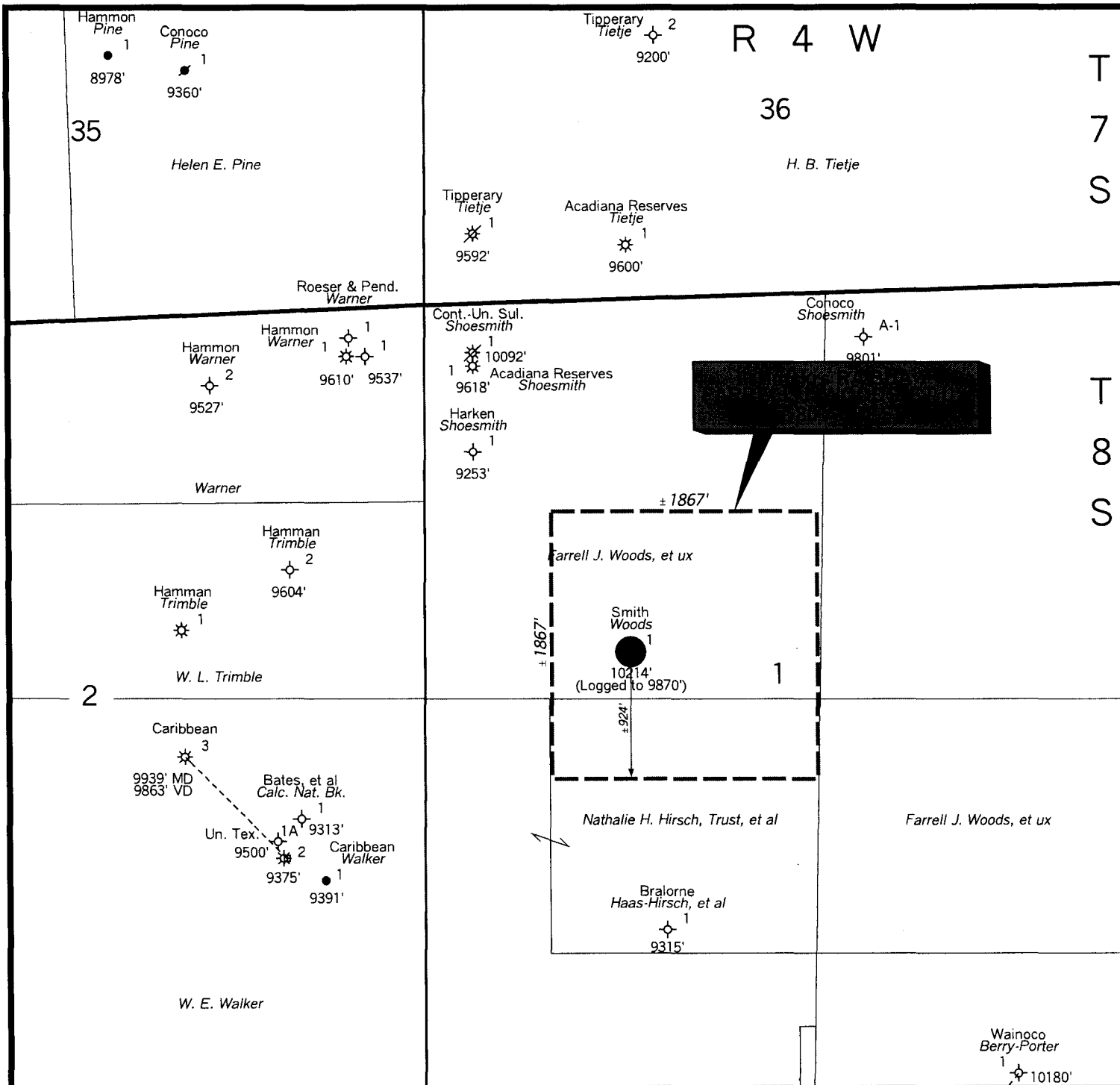


EXHIBIT NO.	DOCKET NO.
VICTOR P. SMITH OIL COMPANY, L.L.C.	
CHINA FIELD	
JEFFERSON DAVIS PARISH, LOUISIANA	
PROPOSED UNIT	
HOMESEEKERS ZONE	
Witness: David Comeaux	
DATE:	
LEON E. COMEAUX & ASSOC. GEOLOGISTS	